

### REMARKS

Reexamination and reconsideration of this application as amended is requested. By this amendment, Claims 1, 11, 12, and 22 have been amended. After this amendment, Claims 1-31 remain pending in this application.

#### Claim Rejections - under 35 USC § 102

(I) The Examiner rejected Claims 1 and 3-31 under 35 U.S.C. 102(b) as being anticipated by Mandel (U.S. Patent No. 5,435,544).

Applicants have amended Claims 1, 11, 12, and 22 to more clearly and distinctly recite the present invention. Support for the amendments may be found in the specification as originally filed, see for example page 17, third paragraph to page 18, end of first paragraph. No new matter was added.

Before discussing the prior art in detail, it is believed that a brief review of the present invention is helpful. Amended claim 1 recites, *inter alia*:

Claim 1 (currently amended): A method of presenting a printer operator interface, the method comprising the steps of:

generating a printer operator display dataset in a processor within a printer, wherein the operator display dataset defines a printer operator interface display and wherein the display dataset conforms to a network protocol;

interpreting, **through use of the network protocol**, the printer operator display dataset within the printer; and

displaying the operator interface display on a display on the printer. (emphasis added)

Amended claims 11, 12, and 22 have been amended to recite similar limitations to amended claim 1.

The presently claimed invention is a system, method, and computer readable medium for incorporating a web server and a web browser within a single printing device. Page 17, third para. In contrast to the prior art, in the present invention, the printer acts as a client to its own server component. Page 10, second para. to page 11, second para. This functionality allows the device to have a panel display without traditional custom-written device-specific display panel code, thereby significantly reducing the implementation effort for the device. *Id.* The operator-panel interface on the printer to only requires generation of the same display information as is provided by the device to remote displays connected via a communications network, such as the internet, using a network protocol, such as hypertext markup language (HTML). Page 10, second para. In other words, the inventive device generates, interprets, and reads the same network-protocol-conforming instructions as it sends to other devices on a connected network. This obviates the requirement to develop and maintain two independent sets of operator interface software modules.

More specifically, the web server of the present invention “*generat[es] a printer operator display dataset... wherein the operator display dataset defines a printer operator interface display*” that can be viewed on a display device on the printer. *Claim 1.* Because an embodiment of the invention generates a single format display dataset that can be viewed on the inventive printer, as well as other devices using a single format, “*the display dataset conforms to a network protocol.*” *Id.* Importantly, the inventive printer contains a web browser that is able to “*interpret[...] the network protocol,*” determine “*the printer operator display dataset,*” and “*display[] the operator interface display on a display on the printer.*” *Id.*

In contrast to the present invention, the Mandel reference discloses an electronic printer and multibin mailbox system for an electronically networked system of multiple users. *Mandel*, abstract. The individual user’s finished print jobs are automatically physically directed into particular electronically-assigned print-job storage mailbox bins of the multibin mailbox system. *Mandel*, col. 21, lines 16-29. The bins are

electronically unlockable, providing restricted public access privacy storage of confidential print jobs.

Mandel further discloses a visual display for reporting to the individual user which locked mailbox bins are occupied by print jobs. *Mandel*, col. 29, lines 6-7. Additionally Mandel discloses a system that generates a network message back to the job sender's terminal as soon as a print job is completed and in a bin. *Mandel*, col. 29, lines 13-15.

It is well-known in the art that printers and other devices provide indicators of status via built-in lights and/or text or graphics displays, and that network-connected devices also provide status over the network using any number of standard (e.g., SMTP, SNMP, HTTP) or proprietary network protocols. In addition, it is well known in the art that the built-in displays and network protocols provide a means of user input to control or adjust the printer or other device.

While Mandel does disclose sending network messages, which inherently use network protocols, to a job-sender's terminal, Mandel does not teach or suggest using this network protocol within the device to create a display. As a result, **Mandel does not disclose** *"interpreting, through use of the network protocol, the printer operator display dataset within the printer; and displaying the operator interface display on a display on the printer"* as do independent claims 1, 11, 12, and 22 of the specification of the instant application.

Mandel simply gives one example of how much intelligence can be included in a printer. Mandel does not suggest or discuss the idea of consuming network-encoded information in the printer.

The Examiner cites 35 U.S.C. § 102(b) and a proper rejection requires that a single reference teach (i.e., identically describe) each and every element of the rejected

claims as being anticipated by Mandel.<sup>1</sup> Because the elements "interpreting, through use of the network protocol, the printer operator display dataset within the printer..." and "displaying the operator interface display on a display on the printer" in independent claims 1, 11, 12, and 22 of the instant application are not taught or anticipated by Mandel, the apparatus of Mandel does not teach or anticipate the presently claimed invention. Dependent claims 3-10, 13-21, and 23-31 are believed to be patentable as well because they depend on claims 1, 12, and 22, respectively. Accordingly, the present invention distinguishes over Mandel for at least this reason. The Applicants respectfully submit that the Examiner's rejection under 35 U.S.C. § 102(b) has been overcome.

#### **Claim Rejections - under 35 USC § 103**

(II) The Examiner rejected Claim 2 under 35 U.S.C. 103(a) as being unpatentable Mandel (U.S. Patent No. 5,435,544) in view of Hammond et al. (U.S. Patent No. 6,820,067).<sup>2</sup>

As stated in section I above, Applicants have amended Claim 1, from which rejected claim 2 depends, to more clearly and distinctly recite the present invention. Support for the amendment may be found in the specification as originally filed, see for example page 17, third paragraph to page 18, end of first paragraph. No new matter was added.

Before discussing the prior art in detail, it is believed that a brief review of the present invention is helpful. Amended claim 1 recites, *inter alia*:

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<sup>1</sup> See MPEP §2131 (Emphasis Added) "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the ... claim."

<sup>2</sup> Applicant makes no statements as to whether such a combination is even proper.

Claim 1 (currently amended): A method of presenting a printer operator interface, the method comprising the steps of:

generating a printer operator display dataset in a processor within a printer, wherein the operator display dataset defines a printer operator interface display and wherein the display dataset conforms to a network protocol;

interpreting, **through use of the network protocol**, the printer operator display dataset within the printer; and

displaying the operator interface display on a display on the printer. (emphasis added)

In the section entitled "Claim Rejections - under 35 USC § 102" above, the claim elements of **"interpreting, through use of the network protocol, the printer operator display dataset within the printer; and displaying the operator interface display on a display on the printer"**, of independent claims 1, 11, 12, and 22, absent from the Mandel reference, was discussed. Claim 2 depends directly from independent claim 1. As stated above, independent claims 1, 11, 12, and 22 distinguish over Mandel. Since dependent claims contain all the limitations of the independent claims, claim 2 distinguishes over Mandel as well.

Applicants wish to point out that the Hammond et al. reference merely discloses accessing hypertext documents with client and server software using Hypertext Transport Protocol (HTTP), which is well-known in the art. *Hammond et al.*, col. 2, lines 52-56. However, Hammond et al. is not related to a printer device and particularly does not teach or suggest placing client and server components within a printing device. Hammond therefore does not teach, anticipate, or suggest the deficiency of the Mandell reference as discussed above.

The Examiner cites 35 U.S.C. § 103. The Statute expressly requires that obviousness or non-obviousness be determined for the claimed subject matter as a whole and the key to proper determination of the differences between the prior art and the present invention is giving full recognition to the invention as a whole. Continuing further, when there is no suggestion or teaching in the prior art for that disclosed in the

application, the suggestion can not come from the Applicants' own specification, as the Federal Circuit has repeatedly warned against using the Applicants' disclosure as a blueprint to reconstruct the claimed invention out of isolated teachings of the prior art. See MPEP §2143 and Grain Processing Corp. v. American Maize-Products, 840 F.2d 902, 907, 5 USPQ2d 1788 1792 (Fed. Cir. 1988) and In re Fitch, 972 F.2d 160, 12 USPQ2d 1780, 1783-84 (Fed. Cir. 1992).

It is accordingly believed that Mandel, whether taken alone or in arguable combination with Hammond et al., neither teaches nor suggests the features of Claim 1. Claim 2 depends from Claim 1. Since dependent claims contain all the limitations of the independent claims, Claim 2 also distinguishes over Mandel and Hammond et al., individually, and also distinguishes over any combination of the two cited references.

### **Conclusion**

The foregoing is submitted as full and complete response to the Official Action mailed March 11, 2005, and it is submitted that Claims 1-31 are in condition for allowance. Reconsideration of the rejection is requested. Allowance of Claims 1-31 is earnestly solicited.

No amendment made was related to the statutory requirements of patentability unless expressly stated herein. No amendment made was for the purpose of narrowing the scope of any claim, unless Applicants have argued herein that such amendment was made to distinguish over a particular reference or combination of references.

Applicants acknowledge the continuing duty of candor and good faith to disclose information known to be material to the examination of this application. In accordance with 37 CFR § 1.56, all such information is dutifully made of record. The foreseeable equivalents of any territory surrendered by amendment are limited to the territory taught by the information of record. No other territory afforded by the doctrine of equivalents is

knowingly surrendered and everything else is unforeseeable at the time of this amendment by the Applicants and the attorneys.


**If the Examiner believes that there are any informalities that can be corrected by Examiner's amendment, or that in any way it would help expedite the prosecution of the patent application, a telephone call to the undersigned at (561) 989-9811 is respectfully solicited.**

The Commissioner is hereby authorized to charge any fees that may be required or credit any overpayment to Deposit Account **50-1556**.

In view of the preceding discussion, it is submitted that the claims are in condition for allowance. Reconsideration and re-examination is requested.

Respectfully submitted,

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